

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

Kim-Chee LLC and Yup Chagi Inc. d/b/a
Master Gorino's Pil-Sung Tae-Kwon Do,

Plaintiff,

v.

Philadelphia Indemnity Insurance Company;
Philadelphia Consolidated Holding Corp. a/k/a
Philadelphia Insurance Companies,

Defendants.

NOTICE OF MOTION

Civil Action No.: 1:20-cv-01136-CCR

Assigned Justice:
Honorable Christina Reiss

Oral Argument Requested

PLEASE TAKE NOTICE that upon the annexed Affirmation of Sharon Angelino, Esq., dated October 8, 2020, and the accompanying Memorandum of Law, Defendants, Philadelphia Indemnity Insurance Company; and Philadelphia Consolidated Holding Corp. a/k/a Philadelphia Insurance Companies, by their attorneys, Goldberg Segalla, LLP, will move this Court, on a date to be determined by The Court, for an Order, pursuant to Fed. Civ. P. 12(b)(6), dismissing the Plaintiffs' Complaint in its entirety, together with such other and further relief as the Court may deem just and proper.

Dated: October 8, 2020
Buffalo, New York

GOLDBERG SEGALLA, LLP

s/ Sharon Angelino

By: _____

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